Message

From: Mary Giraudo [MGiraudo@mbard.org]

Sent: 10/22/2019 11:23:07 PM

To: Zellinger, Andrew [Zellinger.Andrew@epa.gov]

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Subject: Request for Applicability Determination of 40 CFR Part 60 Subpart EEEE

Attachments: ATT00001.txt; Technical Memo - EPA Applicability Determination 08022019.pdf

Hi Andrew,

As conveyed to Matt Salazar on August 2, 2019, the Monterey Bay Air Resources District (MBARD) is requesting a determination regarding the applicability of 40 CFR Part 60 Subpart EEEE – Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006, for a demonstration project at U.S. Army Garrison Fort Hunter Liggett (FHL). The applicant, Sierra Energy is proposing to operate a FastOxTM gasifier to convert pre-sorted municipal solid waste from the FHL base operations into a synthesis gas. The capacity of the gasification reactor is designed for 10 metric tons per day.

Specifically, MBARD is seeking your guidance on whether this project is subject to the regulations based upon the definition of an *Other Solid Waste Incineration (OSWI) unit*, per Section 60.2977 of Subpart EEEE.

I am forwarding Sierra Energy's External Technical Memo, which provides a through overview of the project to assist you in the applicability determination.

Your assistance and a timely response would be appreciated in this matter.

Sincerely,

Mary Giraudo, Engineering Supervisor

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